

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
BIG LOTS, INC., et al.,	:	Case No. 24-11967 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	Re: D.I. 2116, 2238
	:	(Agenda Item 14(d))

**WITNESS AND EXHIBIT LIST OF A.P. GROWTH PROPERTIES, L.P. FOR
MATTERS SCHEDULED FOR HEARING ON MARCH 25, 2025 AT 10:00 A.M.**

TO THE HONORABLE J. KATE STICKLES, UNITED STATES BANKRUPTCY JUDGE:

A.P. GROWTH PROPERTIES, L.P. submits this Witness and Exhibit List for the hearing scheduled for March 25, 2025 at 10:00 a.m. (Eastern).

This list relates to Agenda Item 14(d) at page 10 of the Notice found at D.I. 2328 and filed on March 21, 2025:

14. Notice of Filing of Fifteenth Post-Closing Designation Notice ([D.I. 2116](#), filed 2/27/25).

Objection Deadline: March 14, 2025, at 4:00 p.m. (ET); extended to March 21, 2025, at 4:00 p.m. (ET) for Big Score Investors Inc.

d) Objection of Landlord AP Growth Properties, LP to Proposed Cure for Store No. 1926 (1590 George Dieter, El Paso, Texas) and Limited Objection to Proposed Assumption and Assignment with Reservation of Rights ([D.I. 2238](#), filed 3/14/25).

WITNESS LIST

A.P. GROWTH may call one or more of the following witnesses:

1. Richard Rotwein, Senior Advisor of the property manager, MIMCO Properties, and the Landlord, A.P. GROWTH, L.P.;
2. Alex Cardoza, Executive Vice-President of Operations of the property manager, MIMCO Properties;
3. Ramiro Esparza III, Vice President of Acquisitions and Dispositions of the property manager, MIMCO Properties;

4. Any witness listed or called by the other parties;
5. Rebuttal witnesses as necessary.

EXHIBIT LIST

Exhibit	Description	Docket No./Bates No.
A.	The Lease	(to be filed)

Reservation of Rights

A.P. GROWTH reserves (a) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing and add witnesses and/or exhibits, as applicable, and (b) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. A.P. GROWTH also reserves the right to rely upon and use as evidence (a) exhibits included on the exhibit list of any other parties in interest, and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: March 22, 2025.

/s/Robert R. Feuille

ROBERT R. FEUILLE

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